

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CONSTANCE MILLARD and GERALD	§	
KRELL, Individually and as Representatives	§	
of the Estate of Jason Krell, Deceased;	§	
MICHELLE MARTIN, as tutrix and next	§	
friend of A.P., E.P., and M.S., minors, and as	§	
Representative of the Estate of Quinon Pitre, <i>et al.</i>	§	
	§	
Plaintiffs,	§	
	§	CIVIL ACTION NO.
- against-.	§	4:24-cv-1694
	§	
AMERICAN BUREAU OF SHIPPING, ABS	§	ADMIRALTY CASE
GROUP OF COMPANIES, INC., ABSG	§	
CONSULTING INC., ABS QUALITY	§	
EVALUATIONS, INC., and ABS GROUP	§	
	§	
Defendants.	§	

NOTICE OF APPEAL

Defendants, American Bureau of Shipping, ABS Group of Companies, Inc., ABSG Consulting Inc., ABS Quality Evaluations, Inc., and ABS Group LLC (s/h/a “ABS Group”), appeal to the United States Court of Appeals for the Fifth Circuit from the order granting the Plaintiffs’ motion to remand entered on July 18, 2024 (“Remand Order,” Document No. 18), which is reviewable under 28 U.S.C. § 1447(d) as the case was removed pursuant to 28 U.S.C. § 1442 (*see* Document No. 1, Notice of Removal at 1, 3, 4-5), and from the order denying Defendants’ motion

for reconsideration of the Remand Order pursuant to Federal Rule of Civil

Procedure 59(e) entered on September 5, 2024 (Document No. 22).

HILL RIVKINS LLP

Attorneys for Defendants

American Bureau of Shipping; ABS Group of Companies, Inc.; ABSG Consulting, Inc.; ABS Quality Evaluations, Inc.; and ABS Group

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CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2024, I electronically filed the foregoing document with the Clerk of Court for the United States District Court, Southern District of Texas, using the CM/ECF system of the Court, which will cause the electronic case filing system to send a “Notice of Electronic Filing” to all attorneys of record.

/s/ *John J. Sullivan*
John J. Sullivan